

EXHIBIT 1

abdunn ablairdunn-esq.com

From: abdunn ablairdunn-esq.com
Sent: Friday, September 29, 2023 3:03 PM
To: jdelfin@garcialawgroupllc.com; 'Zach Cook'; warba.llp.jared@gmail.com
Cc: 'Iveth Larkin'; 'Penelope Romanov'; 'Rodney Gabaldon'; 'Bryan Garcia'
Subject: RE: Motion to Set Aside Entry of Default | Springer v. 7th JDC | 1:23-cv-00499-MIS-JMR

No I didn't say we were opposed I asked when you were planning to file the motion to dismiss. You may not note we are opposed and I will absolutely produce this correspondence to the Court. An open ended we will be filing a responsive pleading is not sufficient, especially when you dishonestly allege that a copy of the complaint and summons was not delivered on multiple occasions which it demonstrably was.

Respectfully,



WARBA, LLP

**WESTERN AGRICULTURE, RESOURCE
AND BUSINESS ADVOCATES, LLP**

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From: jdelfin@garcialawgroupllc.com <jdelfin@garcialawgroupllc.com>
Sent: Friday, September 29, 2023 3:00 PM
To: abdunn ablairdunn-esq.com <abdunn@ablairdunn-esq.com>; 'Zach Cook' <zach@zachcook.com>; warba.llp.jared@gmail.com
Cc: 'Iveth Larkin' <ilarkin@garcialawgroupllc.com>; 'Penelope Romanov' <promanov@garcialawgroupllc.com>; 'Rodney Gabaldon' <rgabaldon@garcialawgroupllc.com>; 'Bryan Garcia' <bgarcia@garcialawgroupllc.com>
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Good afternoon,

Thank you for adding Mr. Vander Dussen to this correspondence; I did not see him on your email from yesterday.

I just received notice of your appeal and Motion to Disqualify so I will note your opposition to our Motion.

Sincerely,

Jade Delfin
Associate Attorney
GARCIA LAW GROUP, LLC
6739 Academy Road NE, Suite 200
Albuquerque, NM 87109
Email jdelfin@garcialawgroupllc.com
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From: abdunn ablairdunn-esq.com <abdunn@ablairdunn-esq.com>
Sent: Friday, September 29, 2023 2:23 PM
To: jdelfin@garcialawgroupllc.com; 'Zach Cook' <zach@zachcook.com>; warba.llp.jared@gmail.com
Cc: 'Iveth Larkin' <ilarkin@garcialawgroupllc.com>; 'Penelope Romanov' <promanov@garcialawgroupllc.com>; 'Rodney Gabaldon' <rgabaldon@garcialawgroupllc.com>; 'Bryan Garcia' <bgarcia@garcialawgroupllc.com>
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Mr. Vander Dussen is also counsel of record, please include him in your correspondence. We will confer and get back to you after we have chance to talk about it. But it would be more helpful if we knew when the judicial defendants were planning on following the rules of civil procedure to file their responsive pleading.

Respectfully,



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From: jdelfin@garcialawgrouppllc.com <jdelfin@garcialawgrouppllc.com>

Sent: Friday, September 29, 2023 2:21 PM

To: abdunn@ablairdunn-esq.com <abdunn@ablairdunn-esq.com>; 'Zach Cook' <zach@zachcook.com>

Cc: 'Iveth Larkin' <ilarkin@garcialawgrouppllc.com>; 'Penelope Romanov' <promanov@garcialawgrouppllc.com>; 'Rodney Gabaldon' <rgabaldon@garcialawgrouppllc.com>; 'Bryan Garcia' <bgarcia@garcialawgrouppllc.com>

Subject: Motion to Set Aside Entry of Default | Springer v. 7th JDC | 1:23-cv-00499-MIS-JMR

Good afternoon Mr. Dunn and Mr. Cook,

Attached please find Defendants' Motion to Set Aside Entry of Default. Please advise of your position as to this Motion.

Sincerely,

Jade Delfin
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